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Dockets Management Branch (HFA-305)
Docket No. 98N-1038
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

To Whom It May Concern:

A few thoughts on the radiation of foods, from an ordinary citizen unattached to any special interest groups:

1. When I was a small boy and my mother took my to buy shoes, I put my newly-shod feet into an odd, tall box and everyone looked to see, via the magic of x-ray, exactly how my feet were fitting in our potential purchase. Use of this device, then deemed completely safe, was soon halted, of course, as questions arose. But it is not difficult to remember when mines with some residual radiation in them were considered health resorts, just as early electrical devices, hung from the neck, were considered health-enhancing. It is even less difficult to remember the arguments for nuclear power plants--that they would be "fail-safe," providing clean energy sources for the long haul, and that the problem of what to do with the waste would soon be solved. As we have seen, nothing created and run by man is "fail-safe," nor is there a possible solution for safe storage of nuclear waste with a half-life of half a million years. We have been playing with forces much larger than we can ever be, and certainly of much longer duration.

My point is simple: Most of the predictions about the safety of uses of radiation and nuclear energy have been wrong. We haven't known what the effects of our various uses would be--including the dropping of bombs on human populations--until we have lived with actual experience, in some cases, over a period of years.

2. Nutrition is, bizarrely, a relatively new science to the medical world. Ask a doctor if there is any difference between a One-a-Day brand vitamin capsule and a careful composite of vitamins and materials more easily assimilated by the human body, and he will most likely say, "No, only the price." That is simply and provably incorrect.

An argument rages today regarding red meat. One medical camp considers it a deterrent to the health of our hearts; another regards it as crucial to the health of our hearts, claiming that it reduces hypertension and the likelihood of strokes and cardiac arrest. This kind of disagreement is a constant throughout the medical world today.

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Thus, if a group of scientists claim, after a group of tests, that irradiation of foods in no way minimizes the nutritional value of the foods, and most certainly does nothing harmful to our health, I am inclined to wait to see what the judgment will be in a few years from now.

In the meantime, I am disinclined to eat irradiated foods, and I will find it an infraction on my freedom of choice if I am unable to know which foods have and which have not been irradiated.

3. Thanks especially to the development of quantum physics theory, we have come to see the ways in which the predilections of the observer affect the outcome of any scientific experiment. But we really didn't need quantum physics to know this. For over a hundred years, anthropologists sought evidence of religious expression in ancient sites, paying no attention whatsoever to the myriad female figurines because, from a male-centered bias, the anthropologists assumed that female figures could not represent religion in any way. Where were the male priest figurines?

The major discoveries in science--and, indeed, in all human endeavor--very frequently arise from failed experiments and outrageous mistakes whose perpetrators have wisdom enough not to dismiss because things didn't run according to expectations. Give a group of researchers the task of proving that irradiated foods are safe for human consumption, and it is very likely that they will do exactly what they are being paid to do, and not just because they know which side of their bread is being buttered. The outcome of scientific research depends very greatly on the assumptions we take into it, and there is still a universe of unknowns about irradiation--so we still don't know what we should be looking for.

4. The taste--and much of the nutritional value--of our tomatoes has declined disastrously. Why? Because our focus has been not on nutritional value and taste, but on firmness of skin--on the problems of shipping and shelf life. This is the kind of decision that is counter-productive to the creation and enhancement of health in our society, and it is the kind of decision that is being made daily in all aspects of food growing and processing, shipping, marketing and retailing.

What do we get from irradiation? Longer shelf life. In theory, that means more foods can be made available to more people at less price. In certainty, it means more profits to those agricultural conglomerates which are already the most profitable.

At the very least, I want to be able to know that the food I buy is not irradiated and does not have the latest bad idea in pesticides on its skin or inside the food systemically. At some point, we as a society must make the choice between the importance of health and the importance of further profit. So far, we have not done well with this. The FDA, an imperfect institution at best, is one of our last lines of defense. Please do not fail us.

Yours sincerely,

Paul Dibler

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